

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ETHICON WAVE I CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**DEFENDANTS' MOTION FOR EXTENSION OF TIME FOR ALL PARTIES TO FILE
WAVE ONE MOTIONS IN LIMINE AND RESPONSES TO MOTIONS IN LIMINE**

Defendants Ethicon, Inc. and Johnson & Johnson (hereinafter “Defendants”) move for an extension to **Monday, June 20, 2016**, for the parties to file their Wave One motions in limine, with a corresponding extension to file responses to motions in limine to **Friday, July 1, 2016**, as follows:

The current deadline to file Wave One motions in limine is Thursday, June 16, 2016. [PTO # 217 at ¶ A]. In an effort to decrease the Court’s workload, the parties are seeking to reach a stipulation agreement with respect to some of their proposed motions in limine. Defendants respectfully request that the parties be allowed until **Monday, June 20, 2016**, to file their remaining motions in limine in order to address the stipulation issues and revise any remaining motions in limine to be filed. Defendants also request that the parties be allowed until **Friday, July 1, 2016**, to file responses to motions in limine. Defendants respectfully assert that good cause for these extensions has been shown pursuant to Fed. R. Civ. P. 6.

Counsel for Defendants has conferred with counsel for Plaintiffs who has confirmed that Plaintiffs have no objection to the requested extensions.

WHEREFORE, Defendants respectfully request an extension of time to **Monday, June 20, 2016**, for the parties to file their Wave One motions in limine, with a corresponding extension to file the motions in limine responses to **Friday, July 1, 2016**.

Respectfully Submitted,

/s/ Christy D. Jones

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JOHNSON & JOHNSON

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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